



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX – PACIFIC SOUTHWEST REGION
75 Hawthorne Street
San Francisco, CA 94105-3901

OCT 28 2014

CERTIFIED MAIL – Return Receipt Requested - 7011-0470-0002-9198-4218

Ross Hansen, CEO
Northwest Territorial Mint dba Medallie Art Co.
80 Airpark Vista Boulevard
Dayton, NV 89403

RE: Clean Water Act Section 308 Information Request (CWA-308-9-15-002)

Dear Mr. Hansen:

I am writing to request information from Northwest Territorial Mint dba Medallie Art Co. (Medallie or You) regarding your manufacturing facility at 80 Airpark Vista Boulevard, which sends its industrial wastewater to Lyon County's South Dayton Wastewater Treatment Facility and is subject to pretreatment requirements, including 40 CFR Parts 403, 468 and 471. This request for information is issued pursuant to section 308(a) of the Clean Water Act (CWA or Act), 33 U.S.C. § 1318(a), which authorizes the EPA to require persons subject to the Act to furnish information, conduct monitoring, provide entry to the Administrator or authorized representatives, and make reports as may be necessary to carry out the objectives of the Act.

EPA seeks your response to the requests below. Please read them carefully before preparing your response. Your deadline for responding to this Information Request is shown below.

INFORMATION REQUEST

Based on findings from EPA's April 7, 2014 inspection, the self-analysis in Medallie's Baseline Monitoring Report (BMR) of 2011 is deficient and in need of updating. The BMR is required by 40 CFR § 403.12(b) to ascertain the industrial categories and pretreatment standards applicable to facilities. To correct the deficiencies and update the records regarding applicable pretreatment requirements, EPA requests the following:

1. Provide a complete, updated narrative description of, and visual schematic of all components of your wastewater treatment system, including all sources of wastewater or other influent, all treatment processes, and all sampling points(s). The description and schematic must also indicate the ultimate destination for each portion of the solid and liquid waste stream, whether onsite or offsite.

2. List and describe any and all of your industrial activities, and wastewater-generating activities, including, but not limited to, any that are regulated under 40 CFR Parts 405 through 471. Based upon EPA inspection findings from April 7, 2014, the list should include at least the following: the onsite laundry; precious metals forming (40 CFR Part 471 Subpart D); copper (brass) forming (40 CFR Part 468 Subpart A); and Nickel forming (40 CFR Part 471 Subpart C). Within each industrial category, list each of the regulated industrial activities that are part of the production process.
3. Based on the EPA inspection on April 7, 2014, you combined two or more waste streams within the wastewater treatment process, before the sampling point. Identify:
 - (i) when you began combining your waste streams;
 - (ii) why you combined the waste streams;
 - (iii) whether you are combining waste streams at the time of your receipt of this Information Request;
 - (iv) if the answer to question 3(iii) is no, when you ceased combining the waste streams;
 - (v) if the answer to question 3(iii) is yes, whether you intend to continue this practice, or whether you intend to separate waste streams and sample them independently; if you intend to separate waste streams and sample them independently, specify the date by which you will do so.
5. If you intend to continue combining waste streams before sampling, submit a request for approval of limits based on the combined waste stream formula in 40 CFR Part 403.6(e). Accompany your request with the calculations you used to come up with the applicable limits, showing all of the inputs and calculations.
6. For each industrial category and process listed in your response to Question 2 above, provide an updated calculation of your daily and monthly average off-kilograms produced for the three year period immediately preceding your receipt of this letter. The calculations must be broken down by both industrial category (e.g. precious metals forming) and industrial process (e.g. extruding).
7. Provide your monthly and daily long-term average wastewater discharge volumes, both for the combined waste stream (if still occurring) and for each of the influent streams (including regulated categorical, unregulated, and dilute waste streams) that make up your effluent at the point where samples are taken.

Your responses to each of the requests above must be postmarked within 45 days of receipt of this letter. Submit your response to the following address:

U.S. Environmental Protection Agency, Region 9
Water Enforcement Section I (ENF-3-1)
Attention: Kristine Karlson
75 Hawthorne Street
San Francisco, CA 94105-3901

In the alternative, you may submit your responses as portable document files ("pdf"), including the signed certification, via electronic mail to Ms. Karlson at Karlson.Kristine@epa.gov, within 45 days of receipt of this Information Request.

As required by 40 C.F.R. § 122.22, you must include with all of the above submittals the following certification signed by your responsible corporate officer, or duly authorized representative:


I certify under penalty of law that this submission was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of those who manage the system or are directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations under the Clean Water Act and 18 U.S.C. § 1001.

Failure to comply with this Information Request can result in enforcement action for appropriate relief and penalties under section 309 of the CWA, 33 U.S.C. § 1319. Compliance with this Information Request does not relieve you of your obligation to comply with the CWA or other applicable laws and permits.

This Information Request is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act because it is directed to fewer than ten persons and is therefore not a "collection of information" under 44 U.S.C. § 3502(3). It is also an exempt activity under 44 U.S.C. § 3518(c) and 5 C.F.R. § 1320.4.

Thank you for your cooperation and prompt attention to this matter. The report from EPA's April 7, 2014 inspection is enclosed for your reference. If you have questions about the report or this Information Request, please contact Kristine Karlson of my staff at (415) 947-4297 or have your attorney contact Jessica Kao of the Office of Regional Counsel at (415) 972-3922.

Sincerely,


for Claire Trombadore
Assistant Director
Water and Pesticides Branch
Enforcement Division

Enclosure

cc: Mike Workman, Lyon County Public Utilities
Joseph Maez, NDEP